

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**Taylor Harris,** ) CASE NO.: \_\_\_\_\_  
 )  
**Plaintiff,** ) JUDGE: \_\_\_\_\_  
 )  
**v.** )  
 )  
**Ford Motor Company,** )  
 )  
**Defendant.** ) **NOTICE OF REMOVAL**

Defendant Ford Motor Company (“Ford”) hereby gives notice of the removal of a civil action, Case No. 22CV206176, from the Court of Common Pleas for Lorain County, Ohio to the United States District Court for the Northern District of Ohio, Eastern Division. Removal of this action is proper pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 for the reasons set forth below.

1. On or about June 10, 2022, plaintiff Taylor Harris (“Plaintiff”) filed a Complaint and Summons in the above referenced action in the Court of Common Pleas for Lorain County, Ohio, where it is currently pending. (*See* Summons and Complaint, attached as Ex. A.)

2. Ford was served with the Complaint and Summons on June 21, 2022. (*See* Declaration of Matt Fyie at ¶ 4, attached as Ex. B.) Therefore, this Notice of Removal is timely filed under 28 U.S.C. § 1446(b) because it is being filed within thirty (30) days after the receipt of the Summons and Complaint in this action by Ford.

3. Plaintiff is, and was at all relevant times, a resident of Lorain County, Ohio. (Compl. at ¶ 2, Ex. A.)

4. Ford is, and was at all relevant times, a Delaware corporation with its principal place of business located in the state of Michigan. (Declaration of Matt Fyie at ¶ 3, Ex. B.)

5. Upon information and belief, Plaintiff seeks in excess of \$75,000.00, exclusive of interest and costs. Plaintiff alleges that she has suffered “extreme pain, suffering, mental and emotional trauma, and substantial economic loss” as a result of a “traumatic mutilating power tool machine injury to the right index finger.” (Compl. at ¶¶ 13-14.) She further contends that she has and will continue to suffer from permanent pain and suffering, lost wages “into the indefinite future,” “permanent loss of normal enjoyment of life,” and medical expenses “into the indefinite future.” (*Id.* at ¶¶ 15-18.) Therefore, the amount in controversy exceeds the sum of \$75,000.00 exclusive of interest and costs.<sup>1</sup>

6. This Court has original diversity jurisdiction under 28 U.S.C. § 1332(a), as there is complete diversity of citizenship between Plaintiff and Ford and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

7. The United States District Court for the Northern District of Ohio, Eastern Division, is the proper removal venue as it embraces Lorain County, Ohio.

8. Ford is the only named defendant in the action, so no other entities are required to join in or consent to this Notice of Removal.

9. By filing this Notice of Removal, Ford does not intend to waive, and hereby reserves, any objection as to service, personal jurisdiction, and all other defenses.

10. Pursuant to 28 U.S.C. § 1446(d), a copy of the Notice of Removal to United States District Court is being filed with the Court of Common Pleas for Lorain County, Ohio. This Notice of Removal is being served on counsel for Plaintiff on this date.

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<sup>1</sup> In describing the amount in controversy per Plaintiff’s allegations, Ford does not concede that Plaintiffs are actually entitled to these amounts, and in fact Ford denies that Plaintiffs are entitled to any recovery on the facts and claims alleged.

11. In accordance with 28 U.S.C. § 1446(a), “a copy of all process, pleadings, and orders served upon” Ford are attached as part of Exhibit A.

12. The prerequisites for removal under 28 U.S.C. §§ 1332, 1441, and 1446 have been met. If any questions arise as to the propriety of the removal of this action, Ford requests the opportunity to present a brief, oral argument, and further evidence as necessary in support of its position that this case is removable to this Court.

**WHEREFORE**, Ford removes this case to the United States District Court for the Northern District of Ohio, Eastern Division, being the District and Division for the county in which this action is pending, and respectfully requests that the filing of this Notice of Removal in this Court and with the Court of Common Pleas for Lorain County, Ohio, shall effect removal of this suit to this Court, and that no further proceedings be had in this case in the Court of Common Pleas for Lorain County, Ohio.

Respectfully Submitted,

/s/ Conor McLaughlin  
Conor A. McLaughlin (0082524)  
Anthony Martucci (0090794)  
Stanton V. Williams (0101827)  
Thompson Hine LLP  
3900 Key Center  
127 Public Square  
Cleveland, OH 44114  
Telephone: (216) 566-5500  
Facsimile: (216) 566-5800  
[conor.mclaughlin@thompsonhine.com](mailto:conor.mclaughlin@thompsonhine.com)  
[tony.martucci@thompsonhine.com](mailto:tony.martucci@thompsonhine.com)  
[stanton.williams@thompsonhine.com](mailto:stanton.williams@thompsonhine.com)

*Attorneys for Defendant Ford Motor Company*

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing ***Notice of Removal*** was served by email and regular U.S. mail, postage prepaid, this 19th day July 2022, upon the following:

Henry W. Chamberlain, Esq.  
34790 Detroit Road, Suite 208  
Avon, OH 44011  
Hank@chamberlain-law.com

*/s/ Conor McLaughlin*  
*One of the Attorneys for Defendant*  
*Ford Motor Company*